

ESTTA Tracking number: **ESTTA446721**

Filing date: **12/16/2011**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91199169
Party	Plaintiff Boston Red Sox Baseball Club Limited Partnership
Correspondence Address	JILL K TOMLINSON COWAN LIEBOWITZ & LATMAN PC 1133 AVENUE OF THE AMERICAS NEW YORK, NY 10036 UNITED STATES jkt@cll.com, trademark@cll.com, ame@cll.com, jmn@cll.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Aryn M. Emert
Filer's e-mail	ame@cll.com, jmn@cll.com, trademark@cll.com
Signature	/Aryn M. Emert/
Date	12/16/2011
Attachments	MOCS - RPI - 2 months - Dec 16.PDF (3 pages)(22384 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In re Application Serial No. 85/048,384

Filed: May 26, 2010

For Mark: RPI (Stylized)

Published in the Official Gazette: September 28, 2010

	X		
	:		
BOSTON RED SOX BASEBALL	:		
CLUB LIMITED PARTNERSHIP,	:		
Opposer,	:		
	:		
v.	:		Opposition No. 91199169
	:		
RENSSELAER POLYTECHNIC	:		
INSTITUTE,	:		
Applicant.	:		
	X		

**MOTION ON CONSENT TO CONTINUE SUSPENSION OF PROCEEDINGS AND TO
EXTEND DISCOVERY PERIOD IF OPPOSITION IS RESUMED**

Opposer, by and through counsel, hereby moves for an order further suspending the proceedings in this matter for a period of two (2) months, until **February 29, 2012**. Applicant's counsel consented to this motion, which is requested to allow the parties to continue to engage in settlement discussions.

Progress has been made towards settlement of this matter. Since the last suspension, Opposer's in-house counsel reviewed the draft agreement, and relayed the agreement to the supervising attorney for Opposer's in-house counsel for her review. The additional time is requested to allow for the supervising attorney to review the agreement, and for the parties to continue to work towards settlement of this matter.

In the event that the Board denies this motion, Opposer consents to an extension of time for Applicant to file an answer or otherwise respond to the Notice of Opposition until sixty (60) days after such denial.

If the Board grants this motion, the Board should also reset Applicant's time to answer or otherwise respond to the Notice of Opposition. Additionally, the parties request that six months of discovery be allowed and that the discovery cutoff be reset to six (6) months after the proceedings resume so that the parties will have the full period of discovery in the event that the matter is not able to be resolved. The trial periods and other periods should be reset accordingly.

Dated: New York, New York
December 16, 2011

COWAN LIEBOWITZ & LATMAN, P.C.
Attorneys for Opposer

By: /Aryn M. Emert/

Mary L. Kevlin
Richard S. Mandel
Aryn M. Emert
1133 Avenue of the Americas
New York, New York 10036
(212)790-9200

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on December 16, 2011, I caused a true and correct copy of the foregoing Motion to Suspend to be sent via First Class Mail, postage prepaid, to Applicant's Attorney of Record and Correspondent, Martin J. Ricciardi, Esq., Whiteman Osterman & Hanna LLP, 1 Commerce Plaza, Albany, NY 12260-1000.

/Aryn M. Emert/
Aryn M. Emert